

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DJMASHED UMAROV

Plaintiff,

v.

OUTLAW, et al.

Defendant

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CIVIL ACTION

NO.: 2:22-CV-04163


REQUEST FOR ENTRY OF DEFAULT

Plaintiff, Djamshed Umarov hereby requests pursuant to Rule 55(a) of the Federal Rules of Civil Procedure that the clerk of court enter default of the following Defendant, City of Philadelphia for failure to plead or otherwise defend against this action in a timely manner.

- (1) As shown by the proof of service previously filed with this Court, the above-named Defendant was served pursuant to Rule 4 of the Federal Rules of Civil Procedure on December 16, 2022.
- (2) The applicable time limit for the above-named Defendant to appear or otherwise respond to this action under Rule 12 Federal Rules of Civil Procedure expired on February 14, 2023.

Dated this 3rd day of March, 2023

Respectfully submitted,



Lidia L. Alperovich
Attorney for Plaintiff
PA Attorney ID No.: 89155
Law Offices of Lidia Alperovich, LLC
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Feasterville, PA 19053
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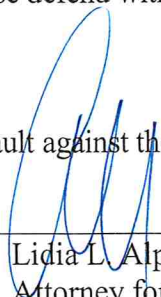
CIVIL ACTION

NO.: 2:22-CV-04163

**AFFIDAVIT IN SUPPORT OF
REQUEST FOR ENTRY OF DEFAULT**

I, Lidia L. Alperovich, being duly sworn, state as follows:

1. I am the attorney for the plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
2. The summons and civil complaint were filed on February 25, 2022 with the Court of Common Pleas of Philadelphia County, (Docket No.: 220202666, February Term).
3. Defendant, Commissioner Danielle Outlaw, filed a Notice of Removal to the United States District Court for the Eastern District Court of Pennsylvania on October 18, 2022.
4. Plaintiff filed Praecipe to Issue Alias Summons on December 6, 2022. *See Exhibit "A"*.
5. Defendant was served with a copy of the Praecipe to Issue Alias Summons, Alias Summons and Civil Complaint on December 16, 2022, as reflected on the docket sheet by the Affidavit of Service filed on March 2, 2023. *See Exhibit "B"*.
6. An answer to complaint was due on February 14, 2023.
7. Defendant has failed to appear, please or otherwise defend within the time allowed and therefore, is now in default.
8. Plaintiff requests that the clerk of court enter default against the defendant.



Lidia L. Alperovich
Attorney for Plaintiff
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CIVIL ACTION

NO.: 2:22-CV-04163

ENTRY OF DEFAULT

Upon consideration of Plaintiffs Request to Enter Default against Defendant pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, DEFAULT is hereby ENTERED.

BY THE CLERK OF COURT:

DATE

CLERK OF COURT

CERTIFICATE OF SERVICE

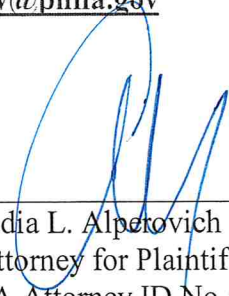
I, Lidia L. Alperovich within the above-captioned matter, hereby certify that on the 3rd day of March, 2023, the foregoing Request for Default was filed electronically and is available for viewing and downloading from the ECF system of the United States District Court for the Eastern District of Pennsylvania. I hereby certify that a true and correct copy of the foregoing Entry of Default, pursuant to the Federal Rules of Civil Procedure was sent via mail and email upon the following on the date shown below,

**City of Philadelphia
1515 Arch Street,
Philadelphia PA 19102**

**Mr. Daniel Cerone – Assistant City Solicitor
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
Email: Daniel.Cerone@phila.gov**

**Mr. Joshua Niemtzow
Assistant District Attorney
Philadelphia District Attorney's Office
Three South Penn Square
Philadelphia, PA 19107
Email: josh.niemtzow@phila.gov**

Date: March 3, 2023



Lidia L. Alperovich
Attorney for Plaintiff
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